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ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED
HARRISBURG, PA

JUN 16 2000

MARY E. D'ANDREA, CLERK
Per
Deputy Clerk

STAMBAUGH'S AIR SERVICE, INC.,

Plaintiff

vs.

No. 1:CV-00-0660

SUSQUEHANNA AREA REGIONAL AIRPORT :
AUTHORITY, BAA HARRISBURG, INC., :
DAVID FLEET, individually, DAVID :
HOLDSWORTH, individually, and DAVID C. :
MCINTOSH, individually :

(Judge Kane)
(Magistrate Smyser) ✓

Defendants

**MOTION OF PLAINTIFF STAMBAUGH'S AIR SERVICE, INC.
FOR EXTENSION OF TIME**

Plaintiff Stambaugh's Air Service, Inc. ("Stambaugh's"), by and
through its undersigned attorneys, files this motion for an extension of time to file
its brief in opposition to defendants' motion to dismiss, and avers as follows:

1. Defendants served their brief in support of their motion to
dismiss Stambaugh's complaint upon Stambaugh's on May 30, 2000.

2. Stambaugh's brief in opposition to defendants' motion to dismiss is due on or before June 19, 2000.

3. Because of the large number and complexity of the issues involved in this case, Stambaugh's requires additional time to address the points made in defendants' motion to dismiss.

4. Accordingly, Stambaugh's respectfully requests that this Court enter an order extending the time for Stambaugh's to file its brief in opposition to defendants' motion to dismiss until June 23, 2000.

5. Defendants will not be harmed by this request.

6. Dean F. Piermattei, Esquire, counsel for defendants, concurs in this motion.

WHEREFORE, plaintiff Stambaugh's Air Service, Inc. requests that this Court order that Stambaugh's brief in opposition to defendants' motion to dismiss is due on or before June 23, 2000.

Respectfully submitted,



THOMAS B. SCHMIDT, III (19196)

BRIAN P. DOWNEY (59891)

RANDY L. VARNER (81943)

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Attorneys for Plaintiff

Stambaugh's Air Service, Inc.

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(Judge Kane)
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Defendants

CERTIFICATE OF CONCURRENCE

I hereby certify that I have sought the concurrence of Dean F.

Piermattei, Esquire, counsel for the defendants, in the foregoing motion of

Stambaugh's Air Service, Inc. Mr. Piermattei concurs in the motion.

Respectfully submitted,

June 15, 2000

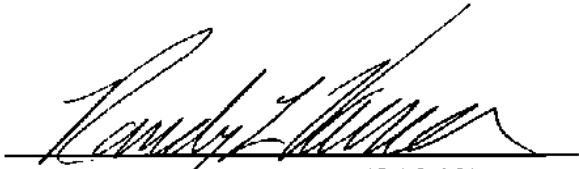


THOMAS B. SCHMIDT, III (19196)

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2000, I served the foregoing document by placing a true and correct copy thereof in the United States mail, first class postage prepaid, addressed as follows:

Dean F. Piermattei, Esquire
Rhoads & Sinon LLP
One South Market Street
P.O. Box 1146
Harrisburg, PA 17108-1146


RANDY L. VARNER (81943)